

1 CARRIE E. HURTIK, ESQ.
2 Nevada Bar No. 7028
3 LINDA L. LAY, ESQ.
4 Nevada Bar No. 12990
5 HURTIK LAW & ASSOCIATES
6 6767 West Tropicana Avenue, Suite 200
Las Vegas, Nevada 89103
(702) 966-5200 Telephone
(702) 966-5206 Facsimile
Attorneys for Plaintiff,
MELISSA IONESCU

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 MELISSA IONESCU, an individual,

10 Plaintiff,

11 vs.

12 BOSTON SCIENTIFIC CORPORATION;
13 JOHNSON & JOHNSON; JOHNSON &
JOHNSON HEALTH CARE SYSTEMS, INC.;
14 ETHICON, INC.; ETHICON LLC; DOES 1-10
and ROE ENTITIES 11-20,

15 Defendants.

Case No.: 2:19-CV-00801-APG-NJK

16 **STIPULATION AND ORDER FOR
EXTENSION OF DEADLINE FOR
PLAINTIFF TO FILE AN OPPOSITION
TO DEFENDANT, BOSTON
SCIENTIFIC CORPORATION'S
MOTION TO DISMISS
(THIRD REQUEST)**

17 Come now, Plaintiff, Melissa Ionescu ("Plaintiff"), by and through her counsel of record, Carrie
18 Hurtik, Esq. of the law firm Hurtik Law & Associates; and Defendant, Boston Scientific Corporation, by
19 and through its counsel of record, Howard J. Russell, Esq. and Josephine E. Groh, Esq. of the law firm
20 Weinberg, Wheeler, Hudgins, Gunn & Dial, LLC, and hereby submit the following Stipulation and
21 Order for Extension of Deadline for Plaintiff to file an Opposition to Defendant, Boston Scientific
22 Corporation's Motion to Dismiss (Third Request).

23 Boston Scientific Corporation filed its Motion to Dismiss on May 15, 2019. The current
24 deadline for Plaintiff to file her Opposition to the Motion to Dismiss is June 12, 2019. The Parties had
25 stipulated that Plaintiff will have until June 12, 2019 to file an Opposition to the Motion to Dismiss as
26 counsel's father was in the hospital and there has not been enough turnaround time to allow review and
27 for the client to approve of the same. The Parties have stipulated to allow Plaintiff to file the Opposition

1 to the Motion to Dismiss on June 17, 2019. There is good cause to allow Plaintiff to file the Opposition
2 by June 17, 2019 which would be the third request of any type of extension and it would not be
3 prejudicial to any of the Parties.

4

5 Dated: June 12, 2019

6

7 Dated: June 12, 2019

8

9 **HURTIK LAW & ASSOCIATES**

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

/s/ *Linda L. Lay*

10 **CARRIE E. HURTIK, ESQ.**
11 **LINDA L. LAY, ESQ.**
12 6767 West Tropicana Avenue, Suite 200
13 Las Vegas, Nevada 89103
(702) 966-5200 Telephone
(702) 966-5206 Facsimile
Attorneys for Plaintiff,
MELISSA IONESCU

10 **WEINBERG, WHEELER, HEDGINS, GUNN &**
11 **DIAL, LLC**

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

/s/ *Howard J. Russell*

10 **HOWARD J. RUSSELL, ESQ.**
11 **JOSEPHINE E. GROH, ESQ.**
12 6385 S. Rainbow Blvd., Suite 400
13 Las Vegas, NV 89119
14 Attorneys for Defendant, BOSTON SCIENTIFIC
15 CORPORATION

16

17

18

19

20

21

22

23

24

25

26

27

28

ORDER

10 Based upon the Stipulation by the Parties hereto, and good cause appearing, it is hereby
11 Ordered that Plaintiff, Melissa Ionescu, shall have until Wednesday, June 17, 2019, to respond to
12 Defendant, BOSTON SCIENTIFIC CORPORATION's Motion to Dismiss Plaintiff's Complaint (ECF
13 No. 5).

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

IT IS SO ORDERED

10 Dated: June 13, 2019.

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28


UNITED STATES DISTRICT COURT JUDGE